MILLER KORZENIK SOMMERS RAYMAN LLP

May 28, 2021

Via ECF
Hon. Peggy Kuo, U.S.M.J.
U.S. District Court, E.D.N.Y.
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Novagold Resources Inc. v. J Capital Research USA LLC*, No. 20-cv-02875-LDH-PK
First Request for Extension of Time To Respond to Motion To Compel

Dear Magistrate Judge Kuo,

On behalf of J Capital Research USA LLC ("J Capital"), I write to request a one-week extension of time to respond to Plaintiff's Motion To Compel (Dkt. 56), from June 2, 2021 up to and including **June 9, 2021**.

The reason for our request is that my firm now has an opposition to a petition for a writ of certiorari due before the Supreme Court on June 4. We did not anticipate this deadline when the parties set the Motion To Compel briefing schedule with Your Honor (*see* Dkt. 55 and Order dated May 11, 2021). I also learned this afternoon that we will have to submit our cert opposition to our printer on the same day our response for J Capital is currently due.

I emailed Plaintiff's counsel this afternoon to seek their inputs on our extension request, and I also left counsel a follow-up voicemail message. I have not heard back as of yet. I informed Plaintiff's counsel that J Capital may be cross-moving as part of its response, and that we could accommodate them if they required additional time to reply and/or respond themselves.

Accordingly, we request the time for J Capital to respond to Plaintiff's Motion To Compel be extended from June 2, 2021 to **June 9, 2021**. Unless the dates are unworkable for Plaintiff's counsel, we would request that Plaintiff's time to reply and respond to any cross-motion be due by June 23, 2021, and that J Capital's time to reply in further support of any cross-motion be due by June 30, 2021. I appreciate Your Honor's consideration.

Respectfully,

/s/Terence P. Keegan
Terence P. Keegan

cc: Counsel of Record by ECF